

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

REBECCA BROWN and AUGUST
TERRENCE ROLIN, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

TRANSPORTATION SECURITY
ADMINISTRATION;

DAVID P. PEKOSKE, Administrator,
Transportation Security Administration,
in his official capacity;

DRUG ENFORCEMENT
ADMINISTRATION;

UTTAM DHILLON, Acting Administrator,
Drug Enforcement Administration, in his
official capacity;

“STEVE” LAST NAME UNKNOWN,
Agent, Drug Enforcement Administration, in
his individual capacity; and

UNITED STATES OF AMERICA,

Defendants.

Civil Action No. 2:20-cv-00064-LPL

AFFIDAVIT FOR ADMISSION *PRO HAC VICE* OF JABA TSITSUASHVILI

I, Jaba Tsitsuashvili, make this affidavit in support of the motion for my admission to appear and practice in this Court in the above-captioned matter as counsel *pro hac vice* for Plaintiffs Rebecca Brown, August Terrence Rolin, and all others similarly situated, pursuant to LCvR 83.2 and LCvR 83.3, LCrR 83.2, and this Court’s Standing Order Regarding *Pro Hac Vice* Admissions dated May 31, 2006 (Misc. No. 06-151).

I, Jaba Tsitsuashvili, being duly sworn, do hereby depose and state as follows:

1. I am an Attorney at the Institute for Justice.
2. My business address is 901 N. Glebe Road, Suite 900, Arlington, VA 22203; my business telephone number is (703) 682-9320; my business fax number is (703) 682-9321; and my email address is jtsitsuashvili@ij.org.
3. I am a licensed attorney and a member in good standing of the bar of the District of Columbia, having been admitted on January 9, 2019 and the bar of California, having been admitted on May 10, 2016. I am also admitted to practice before and am in good standing in the U.S. Court of Appeals for the Ninth Circuit and the U.S. District Courts for the Southern and Central Districts of California.
4. My District of Columbia bar registration number is 1601246 and my California bar registration number is 309012.
5. A current certificate of good standing from the District of Columbia bar is attached to this Affidavit as Exhibit A.
6. I have not been subject to disciplinary proceedings concerning my practice of law.
7. I attest that I am a registered user of ECF in the United States District Court for the Western District of Pennsylvania.
8. I attest that I have read, know, and understand the Local Rules of Court for the United States District Court for the Western District of Pennsylvania.
9. Based upon the foregoing, I respectfully request that I be granted *pro hac vice* admission in this matter.

I certify and attest that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are false, I am subject to punishment.

Dated: January 16, 2020.

Respectfully submitted,

/s/ Jaba Tsitsuashvili
Jaba Tsitsuashvili
DC Bar No. 1601246
INSTITUTE FOR JUSTICE
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jtsitsuashvili@ij.org

Counsel for Plaintiffs

**AFFIDAVIT FOR ADMISSION
PRO HAC VICE OF JABA TSITSUASHVILI**

EXHIBIT A



On behalf of JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals,
the District of Columbia Bar does hereby certify that

Jaba Tsitsuashvili

was duly qualified and admitted on January 9, 2019 as an attorney and counselor entitled to
practice before this Court; and is, on the date indicated below, an Active member in good
standing of this Bar.

In Testimony Whereof,
I have hereunto subscribed my
name and affixed the seal of this
Court at the City of
Washington, D.C., on December
16, 2019.

Julio A. Castillo

JULIO A. CASTILLO
Clerk of the Court

Julio A. Castillo
Issued By:
District of Columbia Bar Membership

For questions or concerns, please contact the D.C. Bar Membership Office at 202-626-3475 or email
memberservices@dcbar.org.